

Questions and Responses for 2020 State RFGAs
Posted May 6, 2019

FY2020-RFGA-MC-908 - Evidence-Based Programs

Organization #1

1. What provisions have been made to ensure that the review panel is aware of the requirements for the applicant to have 3 years of experience using the curriculum for which funding is being applied? It is listed as an eligibility requirement on pages 1 and 3, but it is not listed in the bullets under the Organizational History Scoring section. Are there points associated with demonstrating at least 3 years of experience? Where should we provide the evidence of the 3 years of experience so that the reviewers know where to look for it?

Response: There are 2 points associated with demonstration of at least 3 years of experience using the curriculum. Under the Organizational History section, we have added "Include the number of years of experience using the curriculum for which funding is being applied".

2. On page 6, the applicant must ensure that curricula and supporting materials are evidence-based "or effective for the chosen population." How will "effective for the chosen population" be defined and validated before award is announced?

Response: As specified under Implementation Plan with Goals and Objectives on p. 11, applicants are responsible for providing documentation of the curriculum's effectiveness for the chosen population. Sources could include the curriculum developer and research articles.

3. On page 11 at the 2nd bullet under Implementation Plan, there is a bold statement that says "Higher points may be given to applicants using curricula with documentation of successfully demonstrating improved teen outcomes, which is based on research." Throughout the RFGA, emphasis is placed on affecting teen *behavior*. For example: 1) page 4, "DHEC's intent for this funding is for Abstinence Until Marriage programs to positively impact select health indicators", all of which are related to *behaviors*, 2) page 4, "The program aims to increase the proportion of adolescents postponing sexual activity", with actual postponing being *behavioral*, 3) page 11 2nd bullet under #3 says "effective at changing sexual risk-taking *behavior* among youth", 4) same bullet points says "demonstrated impacts on delaying initiation" which is a behavioral outcome. What provisions have been made for the review panel to score applications based on curricula's documentation of effectively impacting *behaviors*, and not just impacting knowledge, attitude, and beliefs?

Response: Review panel members receive the RFGA documents for their orientation, review of, and scoring of applications. In addition, during their orientation, the review panel members will review applications inclusively based on all the above mentioned factors to include behaviors, knowledge, attitudes, and beliefs.

4. On page 11 at the 2nd bullet point under Implementation Plan, it defines evidence-based as a “program proven through rigorous evaluation...” What provisions have been made for the review panel to score applications based on curricula’s documentation of rigorous evaluation? How is “rigorous evaluation” defined? What provisions have been made to validate pre-award that the chosen curricula have documented effects on behavior with a rigorous evaluation design?

Response: Applicants will provide this information in their implementation plan to ensure that the review panel can adequately evaluate based on the information provided.

Organization#2

1. On page 4 of Evidence-based Programs RFGA, it says, “If counties other than those in priority areas 1 or 2 are included in applicant’s plan...” However, on page 10 it says, “Applicants are encouraged to plan services in Priority Areas 1-3. Should the information on page 4 read, “If counties other than those in priority areas 1-3 are included in applicant’s plan? Question: If so, will the program office be correcting the RFGA?

Response: Yes, the content has been changed to specific priority areas 1-3 instead of 1 or 2.

FY2020-RFGA-MC-909 Emerging Programs

Organization #1

1. For the Service Delivery Area (p.4), the language says that applicants should utilize Table A to guide in the selection of counties. It also says that “if counties other than those in priority areas 1 or 2 are included in an applicant’s plan...” On page 10, it states that “applicants are encouraged to plan services in Priority Areas 1-3.” Please provide clarity about whether it is Priority Areas 1-2 or 1-3.

Response: The content on p. 4 has been revised to reflect Priority Areas 1-3.

2. On page 6 #10, the applicant must use curricula and supporting materials that are “evidence-based, evidence supported as effective for the chosen population,” and on page 11 the RFGA says “provide documentation of the Abstinence Until Marriage curriculum’s effectiveness for the chosen population.” These statements imply a requirement to use a program with evidence of effectiveness on teen behavior.

However, on page 11 2nd bullet under Implementation Plan, applicants are only “recommended” and “encouraged” to use effective strategies and interventions. Please clarify whether it is required to use an evidence-based curriculum or simply recommended. If not required, is it still allowable for applicants to use an evidence-based program?

Response: For the Emerging RFGA, there is no requirement that an evidence-based curriculum be used. State Proviso 34.43 does not define emerging programs; therefore, an evidence-based curriculum can be implemented. However, should a grantee choose to implement an evidence-based curriculum for the Emerging RFGA, we recommend implementing an evidence-based curriculum with a different population or setting than is utilized for the evidence-based funding.

Questions Pertinent to Both RFGAs:

Organization #1

1. Pages 1 and 12 of the evidence-based RFGA and pages 3 and 12 of the emerging RFGA, state that eligibility is based on the “A-F” definitions of Title V, Section 510, yet the “A-H” definition requirement is listed on pages 3 and 6. We believe this to be an inconsistency that needs to be fixed. Considering that these funds are governed by the State Provisos that require that the A-H definition be fulfilled, we believe the RFGA needs to be edited on pages 1 and 12 to only reflect A-H.

Response: The program intended to change from the A-H criteria to the A-F criteria that were instituted with the 2018 amendment to Section 510 of the Social Security Act. This would have lessened the administrative and programmatic burden for anyone receiving both state and federal funding. Since the state provisos have not been updated to reflect the 2018 Section 510 amendment, the program will revise both 2020 state RFGAs and utilize the A-H criteria.

2. What provisions have been made to ensure that curriculum to be used meets all of Title V, Section 510 requirements, as mentioned on pages 1 and 3 and as required by the Proviso language? The program assurances on page 6 and 12 simply state that an applicant must only ensure that nothing contradicts the elements of Title V, Section 510. “Not contradicting” is very different than “meeting all”, and the two statements are not equal. Almost any subject could be taught without contradicting Title V, Section 510, but it does not mean that any subject would “meet all” of the requirements. Considering that the State Proviso 34.44 requires that a program meet all of A-H, we believe the RFGA needs to be edited on pages 6 and 12 to require applicants to show documentation of “meeting all” of A-H rather than requiring documentation of simply “not contradicting” Title V requirements.

Response: The program agrees that the language is inconsistent and has edited the RFGAs accordingly.

3. On pages 2 and 3, the start date and budget period for the project is listed as July 10, 2019, but July 1, 2019 is listed on pages 8, 12, 13 of the Evidence-Based RFGA and 8, 11, 13 of the Emerging RFGA for the budget start date. Please provide clarity about these dates and clarity about how to create a 12 month budget with an 11.75 month contract. A budget covering longer than the contract period would likely leave unspent funds.

Response: The budget period formally begins when both parties have signed the grant agreement. The program can only approximate a start time for the grant budgets since the funding is contingent on the approval of the state budget. Also, timelines are subject to change pursuant to appeals. For consistency, we have removed the language pertaining to a twelve-month budget and changed the language to “approximately July 1” throughout both RFGAs and the draft grant agreement.

4. Please provide the rationale for removing the requirement for an annual risk assessment for the tax-payer money. The previous State Funds RFGA outlined the reasons an annual risk assessment would be required, reasons required pre-award, and reasons required post-award. How will DHEC determine funding risk to agencies prior to award?

Draft Response: The risk assessment is related to federal requirements. Since the state funds are no longer used for federal match, we have removed the risk assessment requirement from both state RFGAs. Risk will be determined through audits, thorough review of invoices, and past performance, if applicable

5. For the Service Delivery Area (p.4), the language says that applicants should utilize Table A to guide in the selection of counties. It also says that “although higher priority locations are preferred, applicants may provide services in other areas if they provide an adequate justification of high need or target population selected.” On page 10, it states that “if the applicant plans services in Priority Areas 4-5, the applicant should provide justification for the inclusion of lower priority counties, such as plans to serve high risk youth population or larger numbers of youth.” What provisions have been made to ensure the review panel knows that these justifications are adequate and acceptable? What provisions have been made to ensure the review panel knows that serving Priority 1-3 is not required?

Response: Review panel members receive the RFGA document for their orientation for review and scoring of applications. In addition, during their orientation, the review panel members will be reminded that risk factors including, but not limited to, placement in foster care, homelessness, and substance use can contribute to the risk of bearing children out of wedlock and are appropriate to be considered in scoring.

6. On page 4, under the State-funded Abstinence Education Performance Measures for FY 2019-20, there is a goal of 3500 youth and 1500 adults. Is that goal a total expectation for this particular RFGA only? Is this goal a total expectation of the combined State Evidence and State Emerging Funds?

Response: For the Emerging RFGA, goals were changed to 500 SC youth and 225 adults. For the Evidence based RFGA, goals were changed to 3000 SC youth and 1275 adults.

7. On page 5, under Required Activities #4, there is a bold statement that says “It is highly recommended that Positive Youth Development (PYD) is included as a part of any risk avoidance strategies to help participants build healthy life skills and protective factors.” Are there any Performance Measures related to PYD (none mentioned on Page 4)? Also, is the PYD framework in the context of *sexual* risk avoidance, or is it open-ended to PYD in the context of any risk avoidance?

Response: There are no specific performance measures related to PYD in the state RFGAs. The program is adopting the description of PYD from the ACF funding opportunity announcement for Title V State Sexual Risk Avoidance Education. This defines Positive Youth Development Approach as risk avoidance strategies that help participants build healthy life skills and protective factors that mitigate the impact of past and future negative factors, empower participants to make healthy decisions, provide tools and resources to prevent pregnancy and STIs, and prevent youth engagement in other risky behaviors. Although sexual risk avoidance is the primary focus, other risks and corresponding mitigating factors may be included.

8. On page 8, there is a requirement for grantees to attend required DHEC sponsored trainings. Can you provide more details about location, length of time, and frequency so that we may adequately budget for the travel expenses? Will there be any other expenses related to the trainings?

Response: No specific trainings have been planned for FY20 at this time. The program anticipates that most technical training will be accomplished by webinar. The program will not require the grantees to fund attendance at any training that has a registration fee or requires an overnight stay. We recommend budgeting the cost of mileage for 1 round trip to Columbia in case a need for an in-person training is identified.

9. On page 9, it says that proposal packets must not exceed a total of 75 pages. This is the same requirement as previous years' RFGA, yet the amount of required information listed on pages 9-12 has drastically increased. Would you consider at least having the Table of Contents not included in the page count? Would you consider increasing the allowed amount while also eliminating the duplicate requested information (as described below)?

DHEC has removed duplicative information in sections “Program Description” and “Implementation Plan. Information submitted once in an application is not

required to be in sections “Program Description” and “Implementation Plan”. The review panel will be given all information submitted by applicants. The Table of Contents will not be included in the 75 page count limit.

10. On page 10, the 1st bullet point under Program Description is an exact duplicate of the 8th bullet under Organizational History (p.10). Please consider eliminating the duplication. This requirement was part of Organizational History in the previous year’s RFGA.

Response: Due to duplication in sections “Program Description” and “Implementation Plan”, DHEC staff will remove references to duplication of required information.

11. On page 10, please clarify the distinction between the 2nd and 3rd bullet points under Program Description. Both bullet points seem to require identifying and describing the target youth population. Because of their similarity and to avoid repetition, can these two bullet points be combined?

Response: Bullets #3, #8 and #10 on page 10 will be removed from the Program Description section and remain under the Implementation section to avoid duplication. Also, bullet #8 under Organizational History will be removed and remain under Program Description to avoid duplication.

12. On page 10, 7th bullet under Program Description: What if our proposed referral plan outlines the inappropriateness of such action in our role with the teens? The language at the end of the bullet point says “when appropriate.” Will points be deducted if the applicant responds with a plan about how it will not be appropriate?

Response: The score sheet will show this as a “yes/no” response. No points will be deducted.

13. On page 11 under Implementation Plan, the 1st, 6th, and 9th bullet points are exact duplicates of the 2nd, 8th, and 10th bullets that were under Program Description. Please consider eliminating the duplication. This requirement was part of the Implementation Plan in the previous year’s RFGA.

Response: Due to duplications in the two identified sections, bullets #2, #8, and #10 will be removed and remain under the Implementation section.

14. In previous years’ RFGAs, there was a requirement in the points sections to state how many youth will be served. Please provide the rationale for no longer requiring applicants to state how many youth they plan to serve with the taxpayer funds.

Response: On Page 11, under Program Description, the bullet “List and describe the abstinence education and/or mentoring program to be provided with abstinence funds and “how many youth will be served” was added.

Organization #2

1. On page 12 of the Evidence-based Programs RFGA and page 11 of the Emerging Programs RFGA under Budget Narrative and Summary, it says, "Organizations seeking fiscal support must develop a twelve-month budget for July 1, 2019 to June 30, 2020. However, on pages 2 and 3 of the RFGA it says, "The program and budget period will begin approximately July 10, 2019 or when grant agreements are fully executed." Should the proposed budget dates be July 10, 2019 – June 30, 2020? If so, will the program office be correcting the instructions on page 11 so reviewers have the correct information?

Response: The budget period formally begins when both parties have signed the grant agreement. The program can only approximate a start time for the grant budgets since the funding is contingent on the approval of the state budget. Also, projected timelines are subject to change pursuant to appeals. For consistency, we have removed the language pertaining to a twelve-month budget and changed the language to "approximately July 1" throughout both RFGAs and the draft grant agreement.

2. On the bottom of page 6 of the RFGA, a new requirement is added for background checks for staff, volunteers or subcontractors who provide education to minors. Would this requirement be necessary of Sheriff Department's staff? Or if a subcontractor does background checks of their staff annually, can those results be provided rather than having another check done?

Response: Yes, all staff who provide education to minors are required to have background checks. If a subcontractor does background checks annually that meet the criteria contained in the RFGAs, those results can be provided and another check will not be necessary.

3. Are background checks being required of HIV prevention and Comprehensive Sex Education program providers?

Draft Response: The DHEC Maternal and Child Health Bureau (MCH) policy and procedures for background checks apply to both the Abstinence Until Marriage/SRAE and the Personal Responsibility Education Program (PREP) that are under the MCH Bureau's oversight. We cannot respond to questions about programs that are managed in other areas of the agency.

4. On page 6 of the RFGA, reference is made to Section 510(b) (2) of the Social Security Act and then defines abstinence education through federal A-H guidelines. Shouldn't this section be referring to the new A-F guidelines and if so, will the program office be correcting the RFGAs?

Response: The program intended to change from the A-H criteria to the A-F criteria that were instituted with the 2018 amendment to Section 510 of the Social Security Act. This would have lessened the administrative and

programmatic burden for anyone receiving both state and federal funding. Since the state provisos have not been updated to reflect the 2018 Section 510 amendment, the program will revise both 2020 state RFGAs and utilize the A-H criteria.

5. There are two areas of both RFGAs in Section III. Required Information for Applicants to Submit that are duplicated. Under Item 1. Organizational History, Experience and Qualifications and Item 2. Program Description, a bullet directs the applicant to “Demonstrate the ability to begin provision of services within thirty (30) calendar days of grant execution.” Under Item 2. Program Description and Item 3. Implementation Plan with Goals and Objectives, a bullet directs the applicant to “Describe any potential barriers or problems and how they will be addressed. “Will the program office be correcting these sections to remove the duplication?

Response: Due to duplication of information, the addressed bullet “Demonstrate the ability to begin provision of services within thirty (30) calendar days of grant execution” was removed from Organizational History and will remain under the Program Description Section. “Describe any potential barriers or problems and how they will be addressed” was removed from the Program Description section and will remain under the Implementation section.

6. On page 11 of both RFGAs, under 4. Reporting and Evaluation, there is a bullet that directs applicants to “Describe the experience the organization has in record keeping of when and how services are provided and evaluating programs to the target population.” It was recently made known to providers that an independent evaluator is not required for these grants as DHEC has hired an evaluator and applicants are directed to verify their participation in the statewide evaluation process. Is it misleading to application reviewers to suggest points be awarded for experience an organization has in evaluating programs to the target population when this is not a requirement? If so, will the program office consider rewording the sentence listed above?

Response: The program has revised the first bullet under Reporting and Evaluation to read: “Describe the experience the organization has of when and how services are provided to the target population (removing the phrase “and evaluating programs”).

7. On page 4 of both RFGAs, it lists State-funded Abstinence Performance Measures for FY 2010-2020. However, both RFGAs list the same minimum numbers of youth (3500) and adult (1500) participation but the dollar amounts of the budgets are

vastly different. Will the program office be correcting the numbers to reflect the available funding for each?

Response: For the Emerging RFGA, goals were changed to 500 SC youth and 225 adults. For the Evidence based RFGA, goals were changed to 3000 SC youth and 1275 adults.